

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

POSTAL RATE AND FEE CHANGES, 1997 )

JAN 29 1998  
Docket No. 97-198

NASHUA PHOTO INC., DISTRICT PHOTO INC.,  
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.  
FIRST INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO UNITED PARCEL SERVICE WITNESS RALPH L. LUCIANI (NDMS/UPS-T4-1)  
(January 28, 1998)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc., proceeding jointly herein, hereby submit the following interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate United Parcel Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

Alan Woll

John F. Callender, Jr.

William J. Olson, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Nashua Photo Inc., District Photo Inc.,  
Mystic Color Lab, and Seattle FilmWorks, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

January 28, 1998

**NDMS/UPS-T4-1.**

Please refer to the portion of your testimony proposing a surcharge on Priority Mail parcels (UPS-T4, pages 42-45).

- a. Where in your testimony do you describe which pieces of Priority Mail would be subject to UPS' proposed surcharge?
- b.
  - i. Are you proposing that the parcel surcharge apply in all Priority Mail rate categories, zoned and unzoned, at all weights?
  - ii. If so, please explain why it makes sense to impose a \$0.10 surcharge on, for example, a 50-, 60- or 70-pound Priority Mail parcel, given the fact that there are no 50-, 60- or 70-pound flats?
- c. Did you consider the possibility of eliminating the 4-cents-per-pound charge built into the rate schedule (as discussed in your testimony at page 44) and instead imposing a 20 cent surcharge on all Priority Mail parcels?
  - i. If not, why not?
  - ii. If so, why did you not recommend it?
- d. Would you agree that the 4-cents-per-pound charge fully compensates for the extra cost of parcels that weigh 5 pounds or more? Please explain fully any answer which is not unqualifiedly in the affirmative.